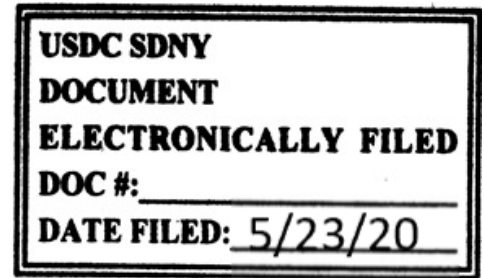


May 23, 2020



VIA ECF FILING

Hon. Katharine H. Parker, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 750
New York, New York 10007

Re: Adrian Wilson v. D'Apostrophe Design Inc.
Docket No.: 20-cv-0003

Dear Judge Parker:

This firm represents the defendant, D'Apostrophe Design Inc. ("D'Apostrophe"), in the above-referenced action. Please accept this correspondence as the parties' joint status letter pursuant to the March 23, 2020 telephonic status conference, and the ensuing scheduling order.

In accordance with the Court's directives, the parties have continued their settlement discussions, however the parties have not been able to get to a resolution as of yet. Nonetheless, D'Apostrophe and Mr. Wilson have exchanged their initial disclosures and first requests for production of documents. D'Apostrophe has served its first production of documents. Mr. Wilson intends to serve his first production of documents within the next 14 days (i.e., not later than June 5, 2020).

In addition, the scheduling order requires the parties to "provide a proposed briefing schedule for Defendant's proposed motion for Plaintiff to post a bond." Both parties have agreed to the following schedule:

D'Apostrophe's moving papers shall be served by: June 25, 2020

Mr. Wilson's responding papers shall be served by: July 10, 2020

D'Apostrophe's reply papers shall be served by: July 17, 2020 (At this date motion will be marked fully submitted.)

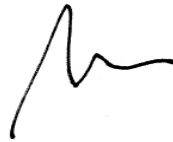
This letter is submitted without waiver or election of any rights with respect to issues not specifically addressed herein. Both counsel thank the Court of its time and consideration devoted to this matter.

Hon. Katharine H. Parker, S.D.J.

May 23, 2020

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Respectfully,
CERMELE & WOOD LLP



Michael R. Wood

LIEBOWITZ LAW FIRM, PLLC

/s/ Richard P. Liebowitz
Richard P. Liebowitz

The Court thanks the parties for the update and requests another joint status update by July 18, 2020. Briefing schedule approved.

SO ORDERED.
5/23/2020



U.S. Magistrate Judge